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September 22, 2022

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Honorable Gregory H. Woods WoodsNYSDChambers@nysd.uscourts.gov

> Case Title: The Estate of Chi Modu v. News Corp.;

> > 1:22-cv-5325-GHW

Request to Adjourn Initial Pretrial Conference Re:

Your Honor:

This office represents Plaintiff, The Estate of Chi Modu, in the above-referenced action. Pursuant to Rule 1(E) of Your Honor's Individual Practices in Civil Cases, we write to respectfully request an adjournment of the Initial Pretrial Conference currently scheduled for September 29, 2022, at 3:00 p.m. (Dkt. #7.) This is the first request for an adjournment.

The reason for this request is that Plaintiff just learned that the proper defendant is The Sun, US, Inc., and in light of this, Plaintiff filed its First Amended Complaint yesterday. Plaintiff needs additional time to serve the proper defendant. Plaintiff is also in touch with counsel for The Sun, US, Inc., and the parties intend to explore the possibility of an early resolution once the proper defendant has been named.

In light of this, Plaintiff respectfully requests an adjournment of approximately 30 days, or a date thereafter convenient to the Court.

We thank Your Honor for your consideration of this request.

Respectfully submitted,

By: /s/ Laura M. Zaharia Scott Alan Burroughs Laura M. Zaharia

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For the Plaintiff

Plaintiff's request to adjourn the initial pretrial conference, Dkt. No. 7, is granted. The initial pretrial conference scheduled for September 29, 2022 is adjourned to November 2, 2022, at 2:00 p.m. The joint status letter and proposed case management plan described in the Court's June 25, 2022 order are due no later than October 26, 2022. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 16.

SO ORDERED.

Dated: September 22, 2022

New York, New York

United States District Judge